

# **EXHIBIT 1**

**From:** [Scott, Robert](#)  
**To:** [Sweeney, John P.](#)  
**Cc:** [Katz, Jennifer](#); [cary@hansellaw.com](mailto:cary@hansellaw.com); [Woodward, Sky](#)  
**Subject:** RE: Maryland Shall Issue v. Hogan et al.  
**Date:** Friday, November 17, 2017 3:59:24 PM

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Counsel – Thank you for your agreement to extend the deadline for responding to your discovery requests. We consent to a 30-day extension for plaintiffs to respond to our requests.

With respect to emails, we propose the following:

1 - MSP maintains an email account linked from MSP's "Contact Us" webpage which contains emails exchanged with individuals who have questions about the HQL application/requirements (the "HQL Email Account").

2 - We have identified a total of eight MSP employees who are most likely to have emails related to citizen inquiries regarding the HQL requirements, the development of regulations, handgun safety training and application processing time.

These employees each have separate Maryland.gov email accounts. They are:

1. Diane Armstrong, Licensing Division Civilian Supervisor
2. Thomas Vondersmith, former MSP Planning and Research Division employee;
3. John Kowalko, former MSP Planning and Research Division intern;
4. Corporal William Rasinski- HQL Unit Supervisor;
5. Captain Andrew Johnson, Division Commander;
6. Lori Brewer- former Civilian Supervisor;
7. Sergeant Jeremy Burns, current HQL Unit Supervisor;
8. First Sergeant Kevin Moriarty

We propose to search both the HQL Email Account and the eight employee accounts with the following search terms:

payment  
waive  
burden  
difficult  
fee  
cost  
afford  
train  
course  
live fire  
credit  
debit  
fingerprint

fifty  
50  
receive  
money order

Upon completion of the email searches, the emails would be subject to our review for privilege and responsiveness. In addition, we will need to discuss how to deal with personal identifying information such as social security numbers and birthdates. Depending on how many emails contain such information, we may be able to simply redact it. However, if that proves too burdensome, we may need to discuss alternatives, such as a confidentiality order.

We look forward to discussing this proposal with you. The sooner we can reach agreement on these issues, the sooner we can get started.

Rob

Robert A. Scott  
Assistant Attorney General  
Civil Division  
Office of the Attorney General  
200 St. Paul Place, 20<sup>th</sup> Floor  
Baltimore, MD 21202  
410-576-7055  
[rscott@oag.state.md.us](mailto:rscott@oag.state.md.us)

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**From:** Sweeney, John P. [mailto:[JSweeney@bradley.com](mailto:JSweeney@bradley.com)]  
**Sent:** Thursday, November 16, 2017 12:28 PM  
**To:** Scott, Robert <[rscott@oag.state.md.us](mailto:rscott@oag.state.md.us)>  
**Cc:** Katz, Jennifer <[jkatz@oag.state.md.us](mailto:jkatz@oag.state.md.us)>; cary@hansellaw.com; Woodward, Sky <[SWoodward@bradley.com](mailto:SWoodward@bradley.com)>  
**Subject:** RE: Maryland Shall Issue v. Hogan et al.

Thank you, Rob.

The Plaintiffs agree to your requested extension if you agree to grant Plaintiffs an additional 30 days as well to respond to your discovery requests.

As for your requested meet-and-confer, we would be happy to engage but believe it would be most fruitful if you first provide us with a brief written description of how your emails and other electronic documents are organized and stored, and for how long and with what backup systems, and a written list of your proposed search terms and other parameters for searching. That way we can confer and react more meaningfully.

With best regards,

**John Parker Sweeney**

Partner | [Bradley](#)  
[jsweeney@bradley.com](mailto:jsweeney@bradley.com)  
202.719.8216

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**From:** Scott, Robert [<mailto:rscott@oag.state.md.us>]  
**Sent:** Wednesday, November 15, 2017 2:22 PM  
**To:** Sweeney, John P. <[JSweeney@bradley.com](mailto:JSweeney@bradley.com)>  
**Cc:** Katz, Jennifer <[jkatz@oag.state.md.us](mailto:jkatz@oag.state.md.us)>; [cary@hansellaw.com](mailto:cary@hansellaw.com); Woodward, Sky <[SWoodward@bradley.com](mailto:SWoodward@bradley.com)>  
**Subject:** RE: Maryland Shall Issue v. Hogan et al.

**[External Email]**

Counsel – We are working diligently to gather information responsive to your discovery requests. However, we are going to need some additional time. Please advise if there is any reason you cannot agree to an extension to December 29, 2017 for service of the responses.

Also, we would like to meet-and-confer to discuss, and hopefully agree on, the parameters for searching MSP emails for responsive information. Please let us know if you are available to discuss this tomorrow or Friday.

Rob

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**From:** Sweeney, John P. [<mailto:JSweeney@bradley.com>]  
**Sent:** Wednesday, October 25, 2017 9:27 AM  
**To:** Scott, Robert <[rscott@oag.state.md.us](mailto:rscott@oag.state.md.us)>  
**Cc:** Katz, Jennifer <[jkatz@oag.state.md.us](mailto:jkatz@oag.state.md.us)>; [cary@hansellaw.com](mailto:cary@hansellaw.com); Woodward, Sky <[SWoodward@bradley.com](mailto:SWoodward@bradley.com)>  
**Subject:** RE: Maryland Shall Issue v. Hogan et al.